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AUG 27 2010
MICHAEL E. HILKE, Clerk
By _____ Dep. Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al.,) No 09-cv-1898 ECR
) REQUEST FOR LEAVE OF COURT
	TO FILE A SHORT
	SURREPLY TO 07.30.10
	RESPONSE FROM
	PLAINTIFFS
ORLY TAITZ, et al.,) CONTAINING VICIOUS MALICIOUS
	ACCUSATIONS AGAINST
	TAITZ MOUNTED BY A
	DANGEROUS CAREER
	CRIMINAL LISA LIBERY
Defendants.) SURREPLY
	REQUEST FOR SANCTIONS, FEES,
DAMAGES	

MOTION FOR LEAVE OF COURT TO FILE SURREPLY

Due to the fact that on 07.30.10. without any shred of evidence attorney Berg filed a malicious, insane, defamatory pleading, accusing Taitz and a decorated officer and licensed investigator Sankey of committing crimes, Taitz is requesting a leave of court to file a short surreply to refute those

absolutely false, insane, vicious and malicious accusations, which came from a career criminal Lisa Liberi, whom Taitz and Sankey caught red handed committing crimes and who has at least 43 criminal charges and 10 criminal convictions.

Surreply

1. On 07.29.10 Taitz and Defend Our Freedoms foundation have filed a response to motion by Berg, as well as their own cross motion for clarification and Reconsideration, as well as request for sanctions, fees and costs.
2. Taitz has proven with clear evidence that current action by plaintiffs is nothing more, but a frivolous legal action filed based on perjury and fraud by Plaintiffs and their attorney and co-plaintiff Philip Berg.
3. Current legal action 09-1898 Liberi v Taitz is a case, where for a year and a half the plaintiffs claimed Assault, Defamation and Slander. The essence of the case was an allegation by the plaintiffs, that when Taitz published on the web site of her foundation, Defend Our Freedoms Foundation, an official report of the criminal history of Lisa Liberi, assistant to attorney Philip Berg, she defamed Liberi, who claimed that she is not the same Lisa

Liberi, who was convicted in CA, but rather an innocent woman in PA, who was never convicted of any crimes and who was defamed and slandered. Berg provided his business address as her address in PA.

4. In the 07.29.10 response Taitz and Sankey provided a picture of Liberi that they got from CA resident John Allen, Liberi's ex-boyfriend and father of her only son. Sankey has shown this picture to Sergeant Morrison, Liberi's arresting officer, who confirmed that this is indeed the same person who was charged with 23 criminal counts of forgery and grand theft and convicted in a plea bargain of 10 charges. Later Sankey forwarded the same picture to Caren and Ed Hale, co-defendants in this case, who were present at August 7, 2009 hearing in front of Your Honor. They confirmed that this is indeed the same person who was right in front of your Honor in the courtroom and together with her attorney Berg and co-plaintiffs defrauded your Honor by making outrageous allegations, that she is an innocent woman, residing in PA, who was never convicted of any crimes, who is physically being present and working at the law office of Philip Berg, that she

was defamed and slandered by the defendants, and who needs a restraining order against the defendants.

5. Taitz has proven that Berg also maliciously defrauded this court and the Third Circuit Court of Appeals by claiming that he made financial arrangements to purchase the transcript, when he never paid a cent.
6. Taitz has proven that he defrauded this court by claiming that the transcript was sealed, while it was never sealed.
7. All of the above provided more than sufficient grounds to sanction the Plaintiffs for filing a frivolous action based on fraud on the court and perjury of this court and the Court of Appeals, as well as reporting Berg to the bar for sanctions and Liberi to her prosecuting authority, San Bernardino, CA District Attorney for violation of her probation.
8. Liberi ended up being cornered responded by admitting that it is indeed her on that picture, whereby Taitz proved her case.
9. At the same time being desperate and afraid to go back to prison, Liberi made up absolutely untrue malicious accusations, claiming that a career police officer Sankey broke into her computer and a licensed doctor and attorney Orly Taitz made a deal with a

criminal to kidnap Liberi's son and Ostella's children. These accusations are so completely insane, that no person in his right mind can possibly believe them. Just to reiterate the point Taitz would like to remind this court that Sankey had a distinguished career as an elite officer of Scotland Yard, working with anti organized crime and anti communist proliferation units, and he is currently a licensed investigator. Taitz is a licensed doctor and attorney, who was never in trouble with the law, does not know any criminals and had nothing to do with any criminals. On the other hand Liberi is a vicious career criminal, who has 43 criminal charges and at least 10 criminal convictions. Liberi has a history of colluding with fellow criminals and manufacturing untrue vicious allegations against her prosecuting Assistant District Attorney James Secord, police officers, police detectives, correctional facility, where she was incarcerated, the whole San Bernardino county. Previously Taitz submitted to this court a copy of the transcript of the testimony of officer Liebrich, testifying and authenticating Liberi's phone conversations from prison, where she tried to collude with fellow inmates in order to frame her own sister, who dared to be an honest person and cooperate with police

and disclosed to them Liberi's prior 19 criminal charges. Since Liberi has used multiple last names and social security numbers, her prior charges are not readily accessible.

10. Liberi, Berg and the rest of the plaintiffs are simply throwing at this court loads of garbage, with the hopes to mislead and fool this court.

11. Defendants hope that this court will not be fooled. The case was proven in the previous pleadings. It is time to end this harassment of the defendants and the courts by a career criminal and her co-conspirators. Liberi, ostella and Berg are dangerous.

Wherefore

Taitz and Defend Our Freedoms Foundation are requesting a grant of their 60 b motion for reconsideration, dismissal of this case with prejudice, sanctions against the Plaintiffs and an award of costs and fees for the defendants.

Respectfully submitted,

/s/ Dr. Orly Taitz, ESQ

I, Orly Taitz, certify under penalty of perjury, that I electronically served
above pleadings on following parties:

Philip Berg

555 Andorra Glen Court, ste 12

Lafayette Hill PA 19444-2531

Neil Sankey

2470 Stearns str #162

Simi Valley, CA 93063

Linda Belcher

201 Paris

Castroville TX 78009

Ed and Caren Hale

1401 Bowie Str

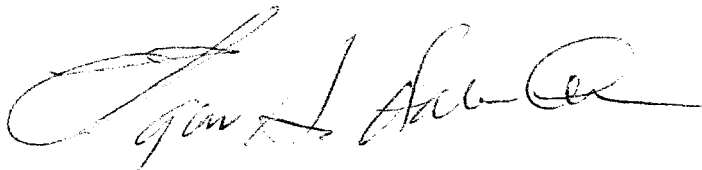
Wellington TX 79095

and Liberi sent to the court and I ask myself a question "Does the court actually believe this?" God only knows, I hope not.

In conclusion, I have proved that Lisa Liberi lives in New Mexico, not in Pennsylvania, as she would have the court believe. She stated that she left her driver's license at home on the court date and did not have it. But did bring her social security card. Would this not show that she had no intentions of showing the courts her address stated on her driver's license? Your Honor, you must clarify your order as to the fact that Lisa Liberi does not live in Pennsylvania, but rather in New Mexico.

This error must be corrected at once.

Thank you.

A handwritten signature in black ink, appearing to read "Edgar S. Hale III", written in a cursive style.

Edgar S. Hale III

08/02/10 11:25

U.S. District Court
Eastern District of Pennsylvania
Third Circuit Court of Appeals,
Case# 10-3000, Liberia et al v. Taitz et al

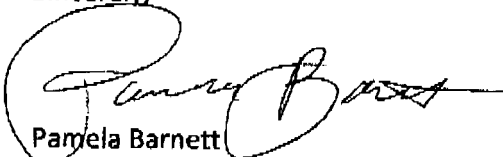
August 2, 2010

I, Pamela Barnett, over the age of 18, and a U.S. citizen residing in California, swear and affirm under the Penalty of Perjury that Phillip Berg is completely incorrect in his accusations in his pleadings (I believe filed July 28, 2010) regarding me having anything to do with writing and/or fraudulently signing Linda Belcher's name on the letter to the court that Linda Belcher wrote, signed and submitted regarding this case. I personally spoke with Linda Belcher August 2, 2010 and she said she is writing an affidavit to affirm the letter that Berg has questioned. See below for direct quotation from Berg's pleading.

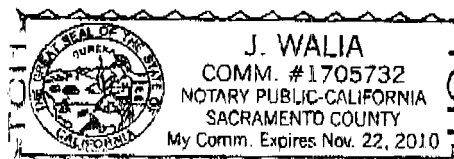
"Appellant Taitz takes it further and basis her arguments on a hearsay letter from Defendant Belcher. It should be noted, the creator of this letter in the name of Linda Belcher appears to be Pamela Barnett, an employee/volunteer of Appellant Orly Taitz. The properties in the document match the properties of documents and filings prepared by Pamela Barnett in other cases. It should also be noted, this letter of Linda Belcher's, which is nothing more than hearsay and fabricated stories, was never served upon Plaintiffs' and only shows carbon copied to Orly Taitz."

I would never forge or submit a forged document to court. I have nothing to do with this case. I have no idea why Phillip Berg would falsely claim that I would forge a letter to the court. Berg irresponsibly made this claim as he has absolutely no basis in fact to believe that I wrote the aforementioned letter. I will look into filing a Bar Complaint against Phillip Berg for falsely accusing me without any basis in fact.

Sincerely,


Pamela Barnett
2541 Warrego Way
Sacramento, CA, 95826

State of California, County of Sacramento
Subscribed and sworn to (or affirmed) before me
on this 2nd day of August, 2010
by Pamela Barnett
proved to me on the basis of satisfactory evidence
to be the person(s) who appeared before me.
Signature: J. Walia



Brad Wool

From: "Orly Taitz" <orly.taitz@gmail.com>
To: <bmw@rapidsameday.com>; "Pamela Barnett" <pb_realestate@yahoo.com>; "Lynda Starr" <newwomensparty@aol.com>; "Neil Sankey" <nsankey@thesankeyfirm.com>
Sent: Monday, August 02, 2010 4:58 PM
Attach: Caren's Statement - Robreno 7-30-2010.pdf; Lisa Liberj.jpg; Liberi v Taitz surreply signature.jpg; Liberi v Taitz 08.02.10 surreply.doc
Subject: Fwd: Caren and Ed Hale's Statements for Orly 4 of 4

----- Forwarded message -----
From: Caren Sieli-Hale <carenhale13@yahoo.com>
Date: Sat, 31 Jul 2010 18:45:05 -0500
Subject: Caren and Ed Hale's Statements for Orly 4 of 4
To: orly.taitz@gmail.com, bmw@rapidsameday.com, pamela@realestate.com, lynda@newwomensparty.com, neil@thesankeyfirm.com



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10/10/2010 17:17:26

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evening of January 1, 2009. The PI was to get the document the next day and send it to them. The court house was closed until 9:00 AM Hawaii time. That was the earliest that the PI could have gotten the document, 1964 Obama vs. Obama divorce decree. Yet Ms. Liberi sent to the court in Wellington, TX a copy of a email dated, January 2, 2009 at 8:00 AM. Central time. Ms Liberi stated that she had sent that email at that time. There is 5 hours time difference between central and Hawaii time. It was impossible for Liberi to have that document and email it to Ms. Adams. That means, Ms. Liberi had to forge that document.

The officials here in Texas are now looking into this with the intent to file criminal charges against both Berg and Liberi.

So Your honor, this is not the first time that Berg and Liberi have committed a fraud upon a court. Please make it their last.

Your Honor, unlike Berg and Liberi, I can prove everything I have stated here. This is not hearsay, but facts that can and will be proven. Please ask Mr. Berg and Ms. Liberi to prove what they have said. They can not.

Your Honor, this must end and end now. This is the most

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of probation in the State of New Mexico. This proves that Liberi has a history of forgery. It also proves that she can and will do anything to get her way. She is a master at forgery on a computer. Your honor, I request that all the documents that Berg has filed in this case be removed from this case since a convicted forger is the one who put these together for Berg. This makes all the documents suspicious since Liberi is the one who did it.

This further proves that when I questioned Liberi in the court on August 7, 2009 and presented that email from Linda Belcher with her address in New Mexico, that she denied, was in fact a true document. Liberi perjured herself then and must be arrested for that crime.

Your Honor, we have had Liberi's address for months now and no one has done a thing to her. She should get a "OSCAR" for her performance claiming she is in fear for her life. This your honor is a scam and she is the frail little ole woman who needs the court's protection from all of us big bad wolves. It is not true.

Once again, Liberi is manufacturing evidence, stating that Sankey stole the picture from her computer. This woman does not know the

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thinks she is smarter than everyone else, including your honor, and everyone will believe her lies.

I was told that she could charm the devil out of his pants and the court would believe anything she said. I pray that I am wrong.

Your Honor, Mr. Berg and Ms Liberi have committed a fraud on another court here in Texas. In a case I filed against Evelyn Adams in small claims court here in Collingsworth County, Texas, Mr. Berg represented Mrs. Adams in that case. In his statement for pro hac visa, he stated that he had never been sanctioned by any court. Your honor that was a lie. He was sanctioned in Holsworth v. Berg by the United States District Court for the Eastern District of Pennsylvania. Mr. Berg is facing the possibility of going to prison for this.

Ms. Liberi is also facing the possibility of going to prison for forgery of a document. Ms. Liberi sent to this judge a copy of a email where she claimed she sent Ms. Adams the 1964 Obama vs. Obama divorce decree at 8:00 am central time on January 2, 2009.

Your Honor, I have audio tape of Ms. Adams talking to Mark McGrew on her blogtalk radio show on January 7, 2009 where they are talking about calling the Private Investigator in Hawaii on the